UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:

No. 14-MD-2543 (JMF) No. 14-MC-2543 (JMF)

GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

Hon. Jesse M. Furman

This Document Relates To All Actions

[REVISED PROPOSED] ORDER APPROVING ECONOMIC LOSS CLASS COUNSEL'S MOTION FOR APPROVAL OF ALLOCATION OF ATTORNEYS' FEES AND COSTS

WHEREAS, in its Order Approving Economic Loss Class Counsel's Rule 23(h) Motion for Approval of Award of Attorneys' Fees and Expenses and Service Awards to Lead Plaintiffs (the "Order," Dkt. No. 8307), the Court awarded to Economic Loss Class Counsel \$24,585,272.06 in attorneys' fees and \$9,914,727.94 to reimburse expenses incurred with the litigation and not previously reimbursed from the Common Benefit Fund (for a total of \$34,500,000);

WHEREAS, the Order provided that "Class Counsel are directed to allocate the fees and costs among eligible Plaintiffs' counsel in a manner that Class Counsel believe, in good faith, reflects the contributions of counsel to the prosecution and settlement of this Action. The allocation among Plaintiffs' counsel shall be approved by this Court, after which Class Counsel shall distribute the fee and expense award as directed by the Court;"

WHEREAS, by minute order dated January 8, 2021, the Court adopted a four-step schedule in connection with the Rule 23(h) fee and cost allocation under which (i) Economic Class Counsel send the proposed allocation to Participating Counsel on February 5, 2021; (ii) following discussions and updates, if any, Economic Loss Class Counsel submit the proposed allocation to the Court and provide it to Participating Counsel; (iii) any objections to the allocation are submitted

on or before March 12, 2021; and (iv) Economic Loss Class Counsel submit responses to any

objections on March 19, 2021. See Dkt. No. 8330;

WHEREAS, in compliance with the Order, on February 5, 2021, Economic Loss Class

Counsel sent a proposed allocation to Participating Counsel;

WHEREAS, on March 5, 2021, Economic Loss Class Counsel submitted the proposed

allocation of fees and expenses to the Court in their Motion for Approval of Allocation of

Attorneys' Fees and Costs (Dkt. No. 8415) (the "Motion"), and Economic Loss Class Counsel

have provided the Motion and the proposed allocation to Participating Counsel;

WHEREAS, the Court has reviewed the allocation and the arguments of all counsel who

submitted briefing;

NOW, THEREFORE, IT IS ORDERED that the Motion is GRANTED. The allocation of

fees and expenses among Participating Counsel in the amounts appearing in Exhibits A and B

hereto is approved. Economic Loss Class Counsel may pay the fee and expense allocation within

30 days of this Order.

SO ORDERED.

Dated: May 28, 2021

New York, New York

*United States District Judge

The Clerk of Court is directed to terminate 14-MD-2543, ECF No. 8415.

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EXHIBIT A

General Motors Ignition MDL: Fee Recovery Amounts by Firm - From Inception To 12/31/20

Firm Designation	Firm Name	Fees
Co-Lead Counsel	Hagens Berman Sobol Shapiro LLP	\$8,837,117.89
	Lieff Cabraser Heimann & Bernstein, LLP	\$6,401,497.21

Firm Designation	Firm Name	Fees
Executive Committee	Boies, Schiller & Flexner LLP	\$443,525.71
	Cotchett, Pitre & McCarthy, LLP	\$590,348.14
	Grant & Eisenhofer P.A.	\$940,093.12
	Motley Rice, LLC	\$959,155.29
	NastLaw, LLC	\$318,089.16
	Otterbourg P.C.	\$356,697.06
	Podhurst Orseck, P.A.	\$358,185.68
	Robinson Calcagnie Robinson Shapiro Davis, Inc.	\$637,695.55
	Susman Godfrey L.L.P.	\$690,371.07
Liason Counsel	Weitz & Luxenberg, P.C.	\$370,590.61
Bankruptcy Counsel	Brown Rudnick LLP	\$3,000,000.00
	Stutzman Bromberg Esserman & Plifka	\$255,739.07

Firm Designation	Firm Name	Fees
Non-Designated Counsel Firm	Ahdoot & Wolfson	\$4,069.42
	Baron & Budd, P.C.	\$19,057.92
	Baron & Herskowitz	\$7,528.72
	Beasley Allen Crow Methvin Portis & Miles, PC	\$10,463.55
	Block & Leviton LLP (PSC)	\$3,536.08
	Bonnett, Fairbourn, Friedman & Balint, P.C.	\$1,560.00
	Cadell Chapman	\$2,141.98
	Carey Danis	\$1,000.00
	Carney Bates & Pulliam, PLLC	\$8,029.57
	Cuneo Gilbert & LaDuca, LLP	\$18,578.37
	Dean Gresham, P.C.	\$1,290.29
	Dicello Levitt & Casey LLC	\$1,000.00
	Donovan Axler LLC	\$10,238.83
	Edward L. White, PC	\$2,663.16
	Gary Peller	\$97,504.60
	Golenbock, Eiseman Assor Bell & Peskoe LLP	\$58,789.18
	Googasian Law	\$1,000.00
	Gray, Ritter & Graham, P.C.	\$2,943.07
	Greene LLP	\$1,000.00
	Gustafson Glueck PLLC	\$1,000.00
	Hazzard Law	\$1,560.98
	Isaac, Wiles, Burkholder & Teetor, LLC	\$1,576.20
	Jeeves Mandel Law Group, P.C.	\$1,000.00
	Jones, Croft & Simpson, LLP	\$1,031.37
	Kaplan Fox & Kilsheimer, LLP	\$1,000.00
	Lackey Hershman L.L.P.	\$7,643.07
	Law Office of Alfred G. Yates, Jr., P.C.	\$1,000.00
	MLG Automotive	\$1,000.00
	Oliver Law Group P.C.	\$1,000.00
	Payne Mitchell Law Group, LLP	\$1,000.00
	Roger L. Mandel, P.C.	\$1,000.00
	Saltz, Mongeluzzi, Barrett & Bendesky, PC	\$1,919.74
	Sommers Schwartz, P.C.	\$1,126.11
	Sonkin & Koberna, LLC	\$1,336.27
	Stueve Siegel Hanson LLP	\$11,249.53
	The Cooper Law Firm, P.C.	\$1,000.00
	Weller, Green, Toups & Terrell, L.L.P.	\$30,973.43
	Wolf Haldenstein Adler Freeman & Herz LLP	\$102,688.03
	Wolf Popper	\$3,667.03

GRAND TOTAL \$24,585,272.06

EXHIBIT B

General Motors Ignition MDL: Expense Reimbursement Amounts by Firm -From Inception To 12/31/20

Firm Designation	Firm Name	Expenses
Co-Lead Counsel	Hagens Berman Sobol Shapiro LLP	\$4,602,885.27
	Lieff Cabraser Heimann & Bernstein, LLP	\$3,161,862.86

Firm Designation	Firm Name	Expenses
Executive Committee	Boies, Schiller & Flexner LLP	\$51,329.70
	Cotchett, Pitre & McCarthy, LLP	\$59,303.87
	Grant & Eisenhofer P.A.	\$429,157.57
	Motley Rice, LLC	\$83,633.26
	NastLaw, LLC	\$14,566.64
	Otterbourg P.C.	\$11,615.87
	Podhurst Orseck, P.A.	\$50,963.14
	Robinson Calcagnie Robinson Shapiro Davis, Inc.	\$300,757.05
	Susman Godfrey L.L.P.	\$134,659.44
Liason Counsel	Weitz & Luxenberg, P.C.	\$242,055.61
Bankruptcy Counsel	Brown Rudnick LLP	\$387,550.39
	Stutzman Bromberg Esserman & Plifka	\$7,046.25

Firm Designation	Firm Name	Expenses
Non-Designated Counsel Firm	Ahdoot & Wolfson	\$2,203.48
	Baron & Budd, P.C.	\$72,229.74
	Baron & Herskowitz	\$1,820.68
	Barrett Law Group, P.A.	\$27,351.88
	Beasley Allen Crow Methvin Portis & Miles, PC	\$127,096.28
	Block & Leviton LLP (PSC)	\$2,078.80
	Bonnett, Fairbourn, Friedman & Balint, P.C.	\$3,898.29
	Carney Bates & Pulliam, PLLC	\$2,752.08
	Cuneo Gilbert & LaDuca, LLP	\$4,816.49
	Dicello Levitt & Casey LLC	\$18.51
	Donovan Axler LLC	\$2,555.50
	Edward L. White, PC	\$28,119.17
	Gary Peller	\$9,327.92
	Golenbock, Eiseman Assor Bell & Peskoe LLP	\$17,609.42
	Googasian Law	\$603.98
	Gray, Ritter & Graham, P.C.	\$5,587.56
	Greene LLP	\$513.13
	Gustafson Glueck PLLC	\$1.28
	Isaac, Wiles, Burkholder & Teetor, LLC	\$14,127.37
	Lackey Hershman L.L.P.	\$655.95
	Law Office of Alfred G. Yates, Jr., P.C.	\$3.06
	MLG Automotive	\$1,227.93
	Saltz, Mongeluzzi, Barrett & Bendesky, PC	\$4,253.35
	Sommers Schwartz, P.C.	\$1,870.64
	Sonkin & Koberna, LLC	\$7.98
	Stueve Siegel Hanson LLP	\$571.85
	The Cooper Law Firm, P.C.	\$13,675.94
	Wolf Haldenstein Adler Freeman & Herz LLP	\$32,287.24
	Wolf Popper	\$75.51
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GRAND TOTAL		\$9,914,727.94